

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

*FILED
CLERK'S OFFICE*

ALBERT WILLIAM BLEAU, JR.,

Plaintiff,

v.

GREATER LYNN MENTAL HEALTH &
RETARDATION ASSOCIATION, et al.,

Defendants.

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U.S. DISTRICT COURT
DISTRICT OF MASS.*
Civil Action No.: 04-10469-REK

**JOINT EMERGENCY MOTION FOR EXTENSION OF TIME TO AND INCLUDING
APRIL 18, 2005 TO RESPOND TO PLAINTIFF'S SIX MOTIONS**

The defendants, Roderick MacLeish, Jr. and Robert A. Sherman (collectively, the "Defendants"), and the Plaintiff, Albert W. Bleau, Jr. hereby jointly move to allow Defendants an extension of time to and including April 18, 2005 in which to respond to the five Motions and Amendments that Bleau has served on Defendants between March 9 and March 23, 2005 and any further amendments thereto. In support of their request, the Parties state as follows:

1. On or about March 9, 2005, Defendants received a variety of motions and oppositions from Plaintiff, which included a Motion Requesting Extension to File Response Brief and Motions, a Motion Requesting Relief to Prevent Continuing Retaliation and Defamation by the Defendants, Motion for Summary Judgment of Plaintiff Albert W. Bleau, and a Motion in Opposition to Defendants' Greater Lynn Mental Health & Retardation Association, et, al, Motions for Summary Judgment, Dismissal, and Entry of Separate and Final Judgment & Memorandum of Plaintiff Albert W. Bleau, Jr. in Support of His Motion for Summary Judgment.

2. On March 23, 2005, Defendants received an amendment to Plaintiff's Motion in Opposition to Defendants' Greater Lynn Mental Health & Retardation Association, et. al,

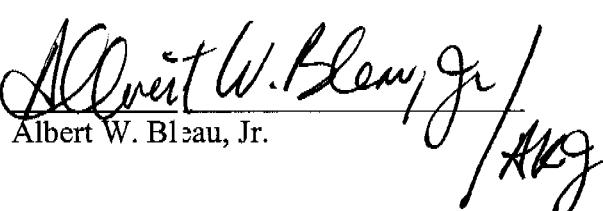
Motions for Summary Judgment, Dismissal and Entry of Separate and Final Judgment & Memorandum of Plaintiff Albert W. Bleau, Jr. in Support of His Motion for Summary Judgment Originally Filed on March 9, 2005 and a Motion to Amend Original Complaint Dated March 8, 2005 to Bring Action Under the Racketeer Influenced and Corrupt Organization Act (RICO), 18 U.S.C. §§ 1951-62 (2000).

3. Plaintiff Bleau also has indicated that he intends to amend his Motions as additional evidence and affidavits become available. Due to the enormous volume of motions and exhibits attached thereto, and because the Plaintiff now seeks to amend his earlier response to Defendant's Motion to Dismiss (and intends to continue to do so in the coming week), the Defendants, respectfully request an extension, in which to reply to Plaintiff's five motions and amendments as enumerated above, to and including Monday, April 18, 2005.

4. Plaintiff Bleau has assented to the proposed extension to and including April 18, 2005, to allow Defendants time to respond to all five of his current Motions and amendments.

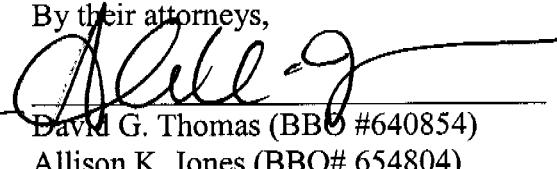
WHEREFORE, Defendants, together with the Plaintiff Bleau, respectfully request that this Court allow an extension within which Defendants may file their responses to Bleau's five motions as enumerated above to and including April 18, 2005.

PLAINTIFF ALBERT W. BLEAU, JR.,


Albert W. Bleau, Jr.

DEFENDANTS RODERICK MacLeish and
ROBERT SHERMAN.

By their attorneys,


David G. Thomas (BBO #640854)
Allison K. Jones (BBO# 654804)
GREENBERG TRAURIG, LLP
One International Place, 20th Floor
Boston, MA 02110
(617) 310-6000

Dated: March 30, 2005

CERTIFICATE OF SERVICE

I, Allison K. Jones, hereby certify that on this 30th day of March, 2005 I served a copy of the foregoing by e-mail and U.S. mail, postage prepaid, upon the Plaintiff, Albert W. Bleau, Jr., 505 Paradise Road, #208m Swampscott, Massachusetts 01907.



A handwritten signature in black ink, appearing to read "Allison K. Jones", is written over a horizontal line. The signature is fluid and cursive, with a distinct "A" and "J".